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Of Attorneys for Defendants City of Tigard and Megan Linn

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

BROOKLYN CLARK,

No. 3:19-cv-00769-YY

Plaintiff,

v.

SHELLY DOE, FRANKIE DOE, TIGARD POLICE DEPARTMENT, MEGAN LINN, COMMUNITY PARTNERS FOR AFFORDABLE HOUSING, RACHAEL DUKE, INCOME PROPERTY MANAGEMENT, HILLARY WINSLOW, ELENA SHAYLA,

DECLARATION OF KIRK W. MYLANDER IN SUPPORT OF DEFENDANTS MEGAN LINN AND THE CITY OF TIGARD'S MOTION TO COMPEL AND FOR SANCTIONS

Defendants.

I, Kirk W. Mylander, hereby declare under penalty of perjury that the following is true and correct:

1. I am one of the attorneys representing defendants City of Tigard and Megan Linn in this matter. This Declaration is offered in support of defendants' Motion to Compel.
2. Attached is a true and accurate copy of the January 20, 2020, emails exchanged between the parties, marked as Exhibit 1.

3. Attached is a true and accurate copy of the February 20, 2020 email from Raechelle Ottosen to Plaintiff sending Defendants' Initial Disclosures, marked as Exhibit 2.

4. Attached is a true and accurate copy of Brooklyn Clark's March 27, 2020 email, attaching a copy of appellant's opening brief in the matter of *Income Property Management and Greenburg Oaks v. Brooklyn Clark*. marked as Exhibit 3.

5. Attached is a true and accurate copy of the August 5 and 6, 2020 emails with Plaintiff, marked as Exhibit 4.

6. Attached is a true and accurate copy of the August 6, 2020 emails with Plaintiff, marked as Exhibit 5.

7. Defendants have incurred \$675 in attorney fees in preparing this motion to compel and for Sanctions for this case, which includes 1.5 hours of legal research and 1.5 hours drafting and revising the motion and supporting documents. Defendants' hourly rate is \$225.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 18th day of September 2020.

KRAEMER & LEWIS

By: s/ Kirk W. Mylander
Kirk W. Mylander, OSB No. 993303
kmylander@cisoregon.org
Attorney for Defendants City of Tigard and Megan Linn

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of September 2020 I served the foregoing

DECLARATION OF KIRK W. MYLANDER IN SUPPORT OF DEFENDANTS MEGAN LINN AND THE CITY OF TIGARD'S MOTION TO COMPEL AND FOR SANCTIONS,
on the following party at the following address:

Brooklynn Clark
BrooklynnClark@mail.com
P.O. Box 6898
Portland, Oregon 97228
Plaintiff Pro Se

by mailing to her a true and correct copy thereof, certified by me as such, placed in a sealed envelope addressed to her at the address set forth above, and deposited in the U.S. Post Office at Portland, Oregon on said day with postage prepaid.

s/ Kirk W. Mylander

Kirk W. Mylander, OSB No. 993303
Attorney for Defendants City of Tigard and
Megan Linn